

## **Exhibit 2**

### **Claims, Defenses, Cross-Claims, and Counter-Claims Related to Litigation and Possible Litigation**

**Exhibit A** includes Entities that are party to or that the Debtors believe may become party to litigation, arbitration, or any other type of adversarial proceeding or dispute resolution proceeding, whether formal or informal, judicial or non-judicial. Unless otherwise released under the Plan, the Debtors expressly reserve all Causes of Action against or related to all Entities that are party to or that may in the future become party to litigation, arbitration, or any other type of adversarial proceeding or dispute resolution proceeding, whether formal or informal, judicial or non-judicial, regardless of whether such Entity is included on **Exhibit A**. The Debtors expressly reserve any and all claims and rights against any and all third parties, whether such claims and rights arose before, on or after the Petition Date, the Confirmation Date, the Effective Date, and/or any Distribution date, including, without limitation, any and all Causes of Action and/or claims for relief that the Debtors have against (i) any insurer and/or insurance policies in which the Debtors and/or their current or former personnel have an insurable or other interest in or right to make a claim against, any of the Debtors' insurers, (ii) any recipient of a transfer identified in the Debtors' SoFAs (as defined below), including (i) Castleman Power Development LLC, (ii) Castleman Power Systems International LLC, (iii) Victoria Midstream, LLC, (iv) Victoria Willow, LLC, (v) Victoria Bloomington, LLC, and (vi) Agilon Energy II LLC.

In addition, **Exhibit A** includes claims and Causes of Action the Debtors expressly retain based in whole or in part upon any and all contracts and leases to which any Debtor or is a party or pursuant to which any Debtor has any rights whatsoever. Notwithstanding the foregoing, the Debtors retain all such claims and Causes of Action reserved including, without limitation, Causes of Action against vendors, suppliers of goods and services, or any other parties: (a) for overpayments, back charges, duplicate payments, improper holdbacks, deposits, warranties, guarantees, indemnities, recoupment, or setoff; (b) for wrongful or improper termination, suspension of services or supply of goods, or failure to meet other contractual or regulatory obligations; (c) for failure to fully perform or to condition performance on additional requirements under contracts with any one or more of the Debtors; (d) for payments, deposits, holdbacks, reserves, or other amounts owed by any creditor, utility, supplier, vendor, insurer, surety, factor, lender, bondholder, lessor, or other party; (e) for any liens, including mechanic's, artisan's, materialmen's, possessory, or statutory liens held by any one or more of the Debtors; (f) arising out of environmental or contaminant exposure matters against landlords, lessors, environmental consultants, environmental agencies, or suppliers of environmental services or goods; (g) counter-claims and defenses related to any contractual obligations; (h) any turnover actions arising under section 542 or 543 of the Bankruptcy Code, and (i) for unfair competition, interference with contract or potential business advantage, breach of contract, infringement of intellectual property, or any business tort claims.

Additionally, on August 9, 2021 and October 14, 2021, respectively, each of the Debtors filed its Schedules and Amended Schedules, which included, among other things, claims and Causes of Action each of the Debtors had reflected as a liability on its books and records, and its *Statement of Financial Affairs*, which details certain information regarding each Debtor's property (collectively and as amended, the "SoFAs"). Unless otherwise released under Article [•] of the Plan, the Debtors expressly reserve all claims and Causes of Action against any Entity listed on

(a) the Schedules, Schedule A/B, Schedule D, Schedule E, Schedule F, Schedule G, and Schedule H of each Debtor and (b) the SoFA of each Debtor, in each case to the extent such Entities owe or may in the future owe money to the Debtor. The Debtors have conducted a limited analysis of potential recoveries under Chapter 5 of the Bankruptcy Code and concluded that potential claims may exist. A list of the known payments are set forth in the Debtors' SoFAs, which are incorporated herein. In addition, all secured creditors scheduled as "disputed" in the Debtors' Schedules are subject to claims for fraudulent transfer and/or preferences on account of asserted security interests or otherwise. ***All Avoidance Actions and rights pursuant to §§ 506(c), 510, 542, 543, 544, 545, 547, 548, 549, 550, 551, 552(b), 553, and 724 of the Bankruptcy Code and all causes of action under state, federal or other applicable law shall be retained and may be prosecuted or settled by the Debtors in their sole discretion.***

Name of Counterparty	Nature
<p>Castleman Power Development, LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Victoria Midstream LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Castleman Power Investment II, LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Castleman Power Systems International LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Victoria Willow, LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>

<p>Victoria Bloomington, LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Ryan Castleman 5850 San Felipe St., Suite 650 Houston, TX 77057</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Gerardo P. Manalac 5850 San Felipe St., Suite 650 Houston, TX 77057</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Agilon Energy II LLC and its affiliated or related entities 5850 San Felipe St., Suite 650 Houston, TX 77057</p> <p>c/o Joseph G. Epstein 24 Greenway Plaza, Suite 970 Houston, TX 77046</p> <p>and</p> <p>Eva S. Engelhart, Chapter 7 Trustee 7700 San Felipe, Suite 550 Houston, TX 77063</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation, including but not limited to Avoidance Actions</p>
<p>Nexus Controls LLC c/o Snow &amp; Green LLP P.O. Box 549 Hockley, TX 77447</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation</p>
<p>Ultimate Industrial Group LLC 800 Town and Country Blvd., Suite 500 Houston, TX 77024</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation</p>
<p>Bay Ltd. c/o Ronald A. Simank Schauer &amp; Simank, P.C. 615 N. Upper Broadway, Suite 700 Corpus Christi, TX 78401</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation</p>
<p>Cormetech Inc. 11707 Steele Creek Rd. Charlotte, NC 28273</p>	<p>Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation</p>

Aerovent 5959 Trenton Lane N Minneapolis, MN 55442	Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation
Randy Turner 215 Orleans St. Beaumont, TX 77701	Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation
Southwest Energy LP 4200 E. Skelly Drive, Suite 1025 Tulsa, OK 74135	Claims related to Claims, Defenses, Cross-Claims, and Counter-Claims related to Litigation and Possible Litigation